

1 Teresa M. Corbin (SBN 132360)  
Christopher Kelley (SBN 166608)  
2 Thomas Mavrakakis (SBN 177927)  
Erik K. Moller (SBN 147674)  
3 HOWREY SIMON ARNOLD & WHITE, LLP  
301 Ravenswood Avenue  
4 Menlo Park, California 94025  
Telephone: (650) 463-8100  
5 Facsimile: (650) 463-8400

6 Attorneys for Plaintiff  
SYNOPSYS, INC.  
7

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11	Synopsys, Inc.,	) Case No. CV 03-02289 MJJ
12		)
13	Plaintiff,	) <b>NOTICE OF MOTION AND MOTION</b>
14	vs.	) <b>REQUESTING COURT ORDER LIFTING</b>
15	Ricoh Company, Ltd.,	) <b>RESTRICTIONS IMPOSED BY</b>
16	Defendant.	) <b>DELAWARE COURT ON DEPOSITION OF</b>
17		) <b>DR. DONALD THOMAS.</b>
18		)
19		)
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22		)
23		)
24		)
25		)
26		)
27		)
28		)

Date: January 6, 2004  
Time: 9:30 a.m.  
Place: Courtroom 11, 19<sup>TH</sup> Floor

**NOTICE OF MOTION AND RELIEF REQUESTED**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 6, 2004, at 9:30 A.M., or as soon thereafter as counsel may be heard in Courtroom 11 of the above-entitled Court, plaintiff Synopsys, Inc. ("Synopsys") will seek an order from this Court authorizing them to take the deposition of Dr. Donald Thomas. Synopsys' motion is based on the following memorandum of points and authorities, all pleadings and papers in the Court's file, the arguments of counsel, and any additional evidence this Court may consider at the time of the hearing.

**MEMORANDUM OF POINTS AND AUTHORITIES**

Synopsys joins in and adopts the arguments made in the Motion Requesting Court Order Lifting Restrictions Imposed By Delaware Court on Deposition of Dr. Donald Thomas, filed December 2, 2003 in *Ricoh Co., Ltd. v. Aeroflex Inc., et al.*, Case No. CV 03-04669 MJJ.

Dated: December 2, 2003

Respectfully submitted,

HOWREY SIMON ARNOLD & WHITE, LLP

By: /s/

Teresa M. Corbin  
Christopher Kelley  
Thomas Mavrakakis  
Erik K. Moller

Attorneys for Plaintiff SYNOPSYS, INC.

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SYNOPSYS, INC.

7 UNITED STATES DISTRICT COURT  
8  
9 NORTHERN DISTRICT OF CALIFORNIA  
10  
11 SAN FRANCISCO DIVISION

12 Synopsys, Inc.,

13 Plaintiff,

14 vs.

15 Ricoh Company, Ltd.,

16 Defendant.

) Case No. CV 03-02289 MJJ

)

) **[PROPOSED] ORDER GRANTING**  
) **DEFENDANTS' MOTION REQUESTING**  
) **COURT ORDER LIFTING RESTRICTIONS**  
) **IMPOSED BY DELAWARE COURT ON**  
) **DEPOSITION OF DR. DONALD THOMAS.**

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) Date: January 6, 2004

) Time: 9:30 a.m.

) Ctrm: 11, 19th Floor

) Judge: Hon. Martin J. Jenkins

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1 This matter came before the Court on January 6, 2004 on motion by plaintiff Synopsys, Inc.  
2 seeking an order from this Court authorizing it to take the deposition of Dr. Donald Thomas.

3 After consideration of the papers filed in support of the motion, any papers filed in opposition,  
4 and any oral argument of counsel:

5  
6 IT IS ORDERED, ADJUDGED AND DECREED that:

- 7 1. Synopsys may take the deposition of Dr. Donald Thomas.  
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9 Dated: \_\_\_\_\_, 2003

\_\_\_\_\_  
10 The Honorable Martin J. Jenkins  
11 United States District Court Judge  
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